

WRIGHT, FINLAY & ZAK, LLP
Christina V. Miller, Esq.
Nevada Bar No. 12448
Krista J. Nielson, Esq.
Nevada Bar No. 10698
7785 W. Sahara Ave., Suite 200
Las Vegas, Nevada 89117
(702) 475-7964; Fax: (702) 946-1344
knielson@wrightlegal.net

Attorneys for Plaintiff/Counter-Defendant, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, FOR THE C-BASS MORTGAGE
LOAN ASSET BACKED CERTIFICATES,
SERIES 2006-CB4,**

Case No.: 2:17-cv-00493-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(SECOND REQUEST)

Plaintiff.

VS.

PANDA LLC SERIES 6233 HALSTEAD;
SHADOW SPRINGS COMMUNITY
ASSOCIATION; RED ROCK FINANCIAL
SERVICES.

Defendants.

PANDA LLC SERIES 6233 HAL STEAD

Counterclaimant

VS

U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, FOR THE C-BASS MORTGAGE
LOAN ASSET BACKED CERTIFICATES,
SERIES 2006-CB4

Counter Defendant

**SHADOW SPRINGS COMMUNITY
ASSOCIATION**

Cross-Claimant

VS.

RED ROCK FINANCIAL SERVICES.

Cross-Defendant.

RED ROCK FINANCIAL SERVICES.

Counter-Claimant,

VS.

SHADOW SPRINGS COMMUNITY ASSOCIATION,

Counter-Defendant.

COMES NOW Plaintiff/Counter-Defendant, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4 (“U.S. Bank”), Defendant/Counterclaimant, Panda LLC Series 6233 Halstead, Defendant/Counter-Claimant Red Rock Financial Services, and Defendant/Counter-Defendant, Shadow Springs Community Association (“Shadow Springs”), by and through undersigned and respective counsel of record, and hereby stipulate as follows:

As previously indicated to the Court, U.S. Bank originally attempted to depose the 30(b)(6) witness for Shadow Springs prior to the close of discovery, however, the parties have encountered difficulties completing the deposition. The deposition of the designated witness for Shadow Springs is currently scheduled for March 6, 2018, while dispositive motions are currently due by February 28, 2018. The parties are requesting an extension of the dispositive motion deadline so that the parties have additional time to fully brief the Court in this matter.

LR 26-4 requires a stipulation to extend a deadline to be made no later than 21 days before the subject deadline and if made within 21 days of the deadline, it must be supported by a showing of good cause. This stipulation is within 21 days of the discovery deadline (February 28, 2018). Good cause exists to extend the discovery deadline, namely scheduling difficulties that prevented the Rule 30(b)(6) deposition from taking place on the previously scheduled dates of December 20, 2017, January 4, 2018, and January 23, 2018.

1 IT IS HEREBY STIPULATED AND AGREED that the Parties shall have an extension
2 of thirty (30) days, up to and until March 30, 2018, to file their respective Motions for Summary
3 Judgment.

4 This is the parties' second request for extension of the dispositive motions deadline.
5 This request is not intended to cause any delay or prejudice to any party.

6 DATED this 28th day of February, 2018.

7 WRIGHT, FINLAY & ZAK, LLP

8 /s/ *Krista J. Nielson*

9 Edgar C. Smith, Esq.
Nevada Bar No. 5506
10 Krista J. Nielson, Esq.
Nevada Bar No. 10698
11 7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
12 *Attorneys for Plaintiff/Counter-Defendant, U.S.
Bank National Association, as Trustee, for the C-
BASS Mortgage Loan Asset Backed Certificates,
Series 2006-CB4*

15 DATED this 28th day of February, 2018.

16 PENGILLY LAW FIRM

17 /s/ *Elizabeth B. Lowell*
18 James W. Pengilly, Esq.
Nevada Bar No. 6085
19 Elizabeth B. Lowell, Esq.
Nevada Bar No. 8551
20 1995 Village Center Cir., Suite 190
Las Vegas, NV 89134
21 *Attorneys for Defendant/Cross-Claimant/Counter-
Defendant, Shadow Springs Community
Association*

DATED this 28th day of February, 2018.

KOCH & SCOW LLC

/s/ *Steven B. Scow*

David R. Koch, Esq.
Nevada Bar No. 8830
Steven B. Scow, Esq.
Nevada Bar No. 9906
11500 South Eastern Avenue, Suite 210
Henderson, NV 89052
*Attorneys for Defendant/Cross-
Defendant/Counter-Defendant, Red Rock
Financial Services*

DATED this 28th day of February, 2018.

AYON LAW, PLLC

/s/ *Luis A. Ayon*
Luis A. Ayon, Esq.
Nevada Bar No. 9752
Allison R. Schmidt, Esq.
Nevada Bar No. 10743
9205 West Russell Road
Building 3, Suite 240
Las Vegas, NV 89148
Attorneys for Panda LLC Series 6233 Halstead

23 ORDER

24 IT IS SO ORDERED.

26 Dated this 2nd day of March, 2018.


27 UNITED STATES MAGISTRATE JUDGE
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